

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**DECLARATION OF DARIUS CHARNEY IN SUPPORT OF PLAINTIFFS' MOTION
TO COMPEL DEFENDANTS TO COMPLY WITH THE COURT'S DECEMBER 19, 2019
ORDER AND OTHER DISCOVERY OBLIGATIONS**

I, Darius Charney, hereby declare, pursuant to 28 U.S.C. § 1746:

1. I am a Senior Staff Attorney at the Center for Constitutional Rights (CCR). I am one of the attorneys representing Plaintiffs and the proposed classes in this action. Unless otherwise stated, the facts set forth below are based on my own personal knowledge, and if called upon to testify, I could and would testify competently thereto.

2. I am an attorney admitted to the Western District of New York.

3. I submit this Declaration in support of Plaintiffs' motion to compel Defendants to comply with the Court's December 19, 2019 order and other discovery obligations about which the parties have reached an impasse.

4. A true and correct copy of my March 10, 2020 email to Defendants' counsel is attached hereto as **Exhibit 1**.

5. A true and correct copy of the spreadsheet enclosed with my March 10 email is attached hereto as **Exhibit 2**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 13, 2020

/s/ Darius Charney
Darius Charney